

JONATHAN O. PENA, ESQ.
CA Bar ID No. 278044
Peña & Bromberg, PLC
2440 Tulare St., Suite 320
Fresno, CA 93721
Telephone: 559-412-5390
Fax: 866-282-6709
info@jonathanpena.com
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Alicia Rico Ballesteros,
Plaintiff,

vs.

Kilolo Kijakazi, Acting
Commissioner of Social Security,
Defendant.

Case No. 2:21-cv-00506-DMC
STIPULATION AND ORDER FOR
EXTENSION OF TIME

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 30-day extension of time, from February 14, 2022 to March 16, 2022, for Plaintiff to serve on defendant with PLAINTIFF'S OPENING BRIEF. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Counsel for Plaintiff points out that the prior extension request has not been ruled upon. As to

1 this request, good cause exists for this extension. As this Court is well aware,
2 Social Security case filings in federal court increased due to a combination of
3 factors including an increase in appeals council decisions and an increase in
4 hearings at the administrative levels. Then, as a result of the pandemic, shelter-in-
5 place mandates, and Court ordered Stays, there were significant delays in
6 producing transcripts. In recent months, Counsel for the Plaintiff has received a
7 greater number of Answers and Certified Administrative Records from defendant
8 including over 60 cases in November and December 2021.

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10 For the weeks of February 14, 2022 and February 21, 2022, Counsel for
11 Plaintiff has 15 merit briefs, and several letter briefs and reply briefs. Counsel also
12 has 12 administrative hearings before the Office of Hearings Operations. Lastly,
13 another attorney with the firm, Ms. Dolly Trompeter, is currently out of state due
14 to her father's medical condition and as a result, the undersigned has taken on
15 additional matters compounding the need for an additional extension.

16 Counsel for the Plaintiff does not intend to further delay this matter.
17 Defendant does not oppose the requested extension. Counsel apologizes to the
18 Defendant and Court for any inconvenience this may cause.

19 Respectfully submitted,

20
21 Dated: February 9, 2022 PENA & BROMBERG, ATTORNEYS AT LAW

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23 By: /s/ Jonathan Omar Pena
24 JONATHAN OMAR PENA
25 Attorneys for Plaintiff
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27 Dated: February 9, 2022 PHILLIP A. TALBERT
28 United States Attorney
PETER K. THOMPSON

Acting Regional Chief Counsel, Region IX
Social Security Administration

By: */s/ Kendall Rees
Kendall Rees
Special Assistant United States Attorney
Attorneys for Defendant
(*As authorized by email on February 9, 2022)

IT IS SO ORDERED:

Dated: February 11, 2022



DENNIS M. COTA
UNITED STATES MAGISTRATE JUDGE

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